

**EB-06-TC-060**

**EB Docket No. 06-36**

**Certification of CPNI Filing  
February 6, 2006**

**(including Carrier Compliance Certificate and Statement)**

**Navigator Telecommunications, LLC.**

**ANNUAL OFFICER'S CERTIFICATE OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

Louis F. McAlister, Affiant, certifies, affirms, deposes and says that:

He is the President of Navigator Telecommunications, LLC.;

That he is authorized to and does make this Certification for Navigator Telecommunications, LLC.;

That he has personal knowledge of Navigator Telecommunications, LLC.'s CPNI operating procedures, the Rules and Regulations of the Federal Communications Commissions regarding CPNI and that Navigator Telecommunications, LLC.'s procedures in place conform and ensure Navigator Telecommunications, LLC.'s ongoing compliance with such Rules, including those set forth in 47 C.F.R. 64.2001, et seq.

A further statement outlining Navigator Telecommunications, LLC.'s procedures in place is attached as *Exhibit A*, as required by 47 C.F.R. 64.2009(e).

That this Certification is effective from February 1, 2006 to February 1, 2007.



Louis F. McAlister  
President  
Navigator Telecommunications, LLC.  
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Dated: February 1, 2006

## **EXHIBIT A**

### **Carrier Compliance Statement of Navigator Telecommunications, LLC.**

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Navigator Telecommunications, LLC. ("Navigator") provides local and long-distance telecommunications services to business and residential customers throughout its service territory. Navigator's company-wide operating procedures ensure compliance with 47 CFR § 64.2001 et seq. and the applicable rules for use of CPNI enumerated therein.

Navigator policy and practice is to use CPNI solely for the purpose of providing telecommunications services to its customers, along with billing, directory services, E911, repair, and other such permitted uses associated with the provisioning of those telecommunications services as provided in applicable FCC rules. Specifically, Navigator does not use, disclose, or permit access to CPNI for any marketing purposes whatsoever.

Because Navigator does not use, disclose, or permit access to CPNI for marketing or other purposes not connected with the provisioning of services to its customers, Navigator has not solicited approval from its customers to use CPNI for those purposes. Likewise, because company policy and practice is to not use CPNI for any purposes which require obtaining and maintaining the status of customer approval for such uses, Navigator has had no need to implement a system as described in 47 CFR § 64.2009(a). Instead, the company-wide rule is consistently applied reflecting that no approval has either been solicited by the company or granted by the customer for use of CPNI for marketing purposes.

It is not the policy or practice of Navigator or its Sales and Marketing Departments or personnel to use, disclose or permit access to CPNI for any sales or marketing campaigns, and such policy and practice cannot be altered except by express supervisory approval of company senior management, which would require implementation of appropriate customer approval solicitation and tracking systems, along with customer notification and opt-in/opt-out mechanisms as mandated by applicable FCC rules. Company senior management, as well as sales and operations management and personnel, are aware of these rules and requirements. Given the company's size and target markets for its services, Navigator has never utilized CPNI for marketing purposes, and consciously and

intentionally instituted its policy and practice of keeping CPNI strictly confidential as a basic aspect of its internal business practices.

All company employees, upon hiring and in their orientation, are instructed about the confidential and protected nature of CPNI, and the fact that it is only to be accessed for purposes of providing services to customers. This policy is stressed in all employees' initial training, and is revisited periodically in ongoing training and instruction. Employee policy provided to all employees instructs that violation of company policy regarding the use or disclosure of customer information will subject an employee to disciplinary action up to and including discharge.

This consistently applied and reinforced company-wide policy prohibiting the use, disclosure, or access to CPNI for purposes other than the provision of telecommunications services or services necessary to or used in the provision of such telecommunications services, as well as the company's past practice and operating procedure eschewing the use of CPNI for any marketing purposes, ensures that Navigator is in compliance with FCC rules in 47 CFR §64.2009.